

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

| | | |
|-------------------------------------|---|-------------------------|
| ELMER HEISNER, Individually, and on |) | |
| Behalf of JAYNE HEISNER |) | |
| |) | |
| Plaintiff |) | Case No.:08 C 593 |
| v. |) | |
| |) | Judge David H. Coar |
| GENZYME CORPORATION, |) | |
| a Massachusetts Corporation |) | Magistrate Judge Denlow |
| |) | |
| Defendant |) | |

Proposed Scheduling Order

This matter before this Court for status and entry of an initial scheduling order pursuant to Fed.R.Civ.P 16 b and 26(f), due notice having been given and the parties having filed a joint report of the parties planning conference held on May 6, 2008 it is hereby Ordered as follows:

1. The report of the parties planning conference is accepted.
2. Discovery Plan. The parties joint proposed discovery plan and schedule is accepted.

Initial Disclosures. Exchange initial Rule 26(a)(1) disclosures within 14 days after the court's ruling on the pending Motion to Dismiss and subject to entry of a protective order.

Maximum of 25 interrogatories by each party to any other party.
Responses are due 30 days after service.

Maximum of 10 depositions by plaintiff(s) and 10 by defendant(s) excluding specially retained experts. Each deposition limited to maximum of 7 hours unless extended by agreement of parties.

Plaintiffs are allowed until September 30, 2008 to join additional parties or amend the pleadings to the extent permitted by law.

Defendant is allowed until October 30, 2008 to join additional parties or amend the pleadings to the extent permitted by law.

Fact discovery to cut off December 30, 2008.

Reports from and depositions of specially retained experts under Rule 26(a)(2) due from plaintiff(s) by January 25, 2009, with experts to be available for deposition from February 4 through March 4, 2009. Rules 26(a)(2) reports due from defendant by March 11, 2009, with experts to be available for depositions from March 18 through April 15, 2009.

All discovery is to be completed by March 31, 2009.

3. Motions. Dispositive motion should be filed by April 30, 2009; with response briefs due May 29, 2009 and reply briefs due June 26, 2009.
4. Final Pretrial Order and Conference is set for
5. Final lists of witnesses and exhibits under rule 26(a)(3) are due: from plaintiff(s) by May 15, 2009; and from defendant by May 22, 2009. The parties will have 5 working days after service of the opposing party's lists of witnesses and exhibits to list objections under Rule 26(a)(3).
6. Trial is set for .

Date: _____

Judge: _____